

IN IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

IAN V. JACOBS,

Plaintiff/Counterclaim-
Defendant,

v.

FAREPORTAL INC.,

Defendant/Counterclaim-
Plaintiff.

Civil Action No. 8:17 Civ. 00362

**FAREPORTAL INC.'S
MOTION TO COMPEL**

FILED UNDER RESTRICTED ACCESS

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Declaration of Eleanor M. Lackman dated June 12, 2020 and the exhibits attached thereto, and all prior pleadings and proceedings herein, defendant counterclaim-plaintiff Fareportal Inc. ("Fareportal"), by and through its undersigned counsel, will move this Court, telephonically or through videoconferencing due to the ongoing emergency occasioned by the worldwide COVID-19 pandemic (*see* General Order Nos. 2020-04 and 2020-09), before the Honorable Cheryl R. Zwart, on a date and time to be designated by the Court, for an order granting Fareportal's motion to compel plaintiff counterclaim-defendant Ian V. Jacobs to fully respond to Fareportal's damages discovery requests, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Nebraska Civil Rule 7.1, opposing papers must be filed and served within fourteen days after filing and service of this motion, and reply papers, if any, must be filed and served within seven days after the filing and service of the opposing papers.

Respectfully submitted,

Dated: New York, New York
June 12, 2020

/s/ Eleanor M. Lackman
Eleanor M. Lackman, *pro hac vice*
Marissa B. Lewis, *pro hac vice*
MITCHELL SILBERBERG & KNUPP LLP
437 Madison Avenue, 25th Floor
New York, New York 10022
Tel.: (212) 509-3900
Fax: (212) 546-7675
eml@msk.com
mbl@msk.com

Michael T. Hilgers (#24483)
HILGERS GRABEN PLLC
14301 FNB Parkway, Suite 100
Omaha, Nebraska 68154
Tel.: (402) 218-2106
mhilgers@hilgersgraben.com

*Attorneys for Defendant-Counterclaim-Plaintiff
Fareportal Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on June 12, 2020, I caused the foregoing Motion to Compel to be filed with the Clerk of the Court using the CM/ECF system, which sent notification of same to all CM/ECF participants.

/s/ Eleanor M. Lackman